

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:25-cv-21291-LEIBOWITZ/AUGUSTIN-BIRCH

SHELBY MAYES,

Plaintiff,

v.

J & J GREEN PAPER, INC., et al.,

Defendants.

Defendants J & J Green Paper, Inc. and Michael Scott Segal's Motion to Postpone the Settlement Conference Scheduled for August 4, 2025 and Extend the Deadline to File the Confidential Settlement Memorandum

Defendants, J & J Green Paper, Inc. ("Defendant J&J") and Michael Scott Segal ("Defendant Segal") (collectively referred to as "Defendants"), by and through their undersigned counsel hereby file this Motion to Postpone the Settlement Conference scheduled for August 4, 2025 at 10:00 AM pursuant to the Court's June 9, 2025 Order [D.E. 27] and Extend the Deadline to File the Confidential Settlement Memorandum. In doing so, Defendants state as follows:

1. Defendant Segal will be in the Kingdom of Saudi Arabia on business on August 4, 2025 based upon an invitation extended by the Saudi government.
2. The seven (7) hour time difference coupled with the inability to control the length of scheduled meetings with the Saudi government would make attendance at the Court's Settlement Conference scheduled for August 4, 2025 before U.S. Magistrate Judge Panayotta Augustin-Birch extremely hard to manage.
3. Defendants have willingly engaged in settlement negotiations in good faith with Plaintiff's Counsel thus far.

4. This request to postpone the settlement conference and submission of their settlement memorandum is not being made to delay any other deadlines in this case and no prejudice will result from rescheduling the proposed settlement conference by two (2) weeks or more.

5. Counsel for Defendant spoke with Plaintiff's counsel, Brian Pollack on July 25, 2025 and he does not have any objection to the settlement conference before U.S. Magistrate Judge Panayotta Augustin-Birch being postponed by two (2) weeks or more.

WHEREFORE Defendants J & J Green Paper, Inc. and Michael Scott Segal respectfully request that this Court issue a new Order postponing the settlement conference by at least two (2) weeks and extending the deadline to file their Confidential Settlement Memorandum.

Local Rule 7.1 Attorney Conference Certification

The undersigned attorney certifies that she has complied with the attorney-conference requirement of Local Rule 7.1 as detailed in Paragraph 5, and Plaintiff's counsel has no objection to the relief sought.

July 28, 2025

Respectfully submitted,

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By: /s/Lisa McKellar Poursine
LISA MCKELLAR POURSINE, ESQ.
Florida Bar No: 65474

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 28, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will serve via transmission of Notices of Electronic Filing generated by CM/ECF on all counsel of record on the attached Service List.

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SERVICE LIST

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